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RE: Comments on USEPA Proposed Plan for the Portland Harbor Superfund Site

Dear USEPA:

Following are two comments on the Portland Harbor Superfund Site Proposed Plan, submitted on behalf of Chevron by Chevron Environmental Management Company.

1. **PCB RAL for SDU RM7W**

FS Appendix D describes the process for the development of RALs. Using this process, EPA developed site-wide RALs for PCBs and PAHs, but developed SDU-specific RALs for DDx, PeCDF and TCDD. EPA set the site-wide PCB RAL at 200 ug/kg, corresponding to the 'knee' of the PCB RAL curve. Chevron requests that EPA re-instate the site-wide PCB RAL of 200 ug/kg for the upstream portion of Sediment Decision Unit (SDU) RM7W (the area of Willbridge Cove upstream of the Kinder Morgan dock), replacing the Alternative I PCB RAL of 75 ug/kg used in the Proposed Plan. SDU RM7W was assigned RALs from Alternative F (Proposed Plan Table 17), which lowered the PCB RAL from the site-wide RAL of 200 ug/kg to 75 ug/kg. It appears that the reduction in the PCB RAL for this SDU was made inadvertently when the other, Focused COCs for this SDU were lowered. The Focused COCs for SDU RM7W were DDx/PeCDF/TCDD, not PCBs (Proposed Plan Table 16). Of the eight SDUs with PCB listed as a Focused COC, seven SDUs have a PCB RAL of 200 ug/kg. Remediating the sediment in this area to the 75 ug/kg PCB RAL would have a minimal effect on the concentration of DDx, PeCDF or TCDD in SDU RM7W and would not be cost effective in reducing the site-wide PCB SWAC.

2. **TPH-d in pore water**

The Proposed Plan sets the remedial goal for total petroleum hydrocarbons in the diesel range (TPH-d) at 2.6 micrograms per liter (ug/L), based on the Baseline Ecological Risk Assessment (BERA). It is not clear how this concentration was derived, but we note that this proposed remedial goal is identical to the toxicity threshold concentration for the C10 - C12 aliphatic hydrocarbon fraction. The C10 – C12 fraction is a small subset of hydrocarbons present in the broader TPH-d fraction. The other aromatic and aliphatic fractions that make up a TPH-d concentration (as measured by the lab) are less toxic than the C10-C12 aliphatic fraction and a remedial goal based solely on the toxicity of the C10 - C12 aliphatic fraction (i.e., TPH-d at 2.6 ug/l) will be overly protective for groundwater and pore water impacted by diesel or other hydrocarbons. Therefore, a remedial goal for TPH-d based solely on the toxicity of C10-C12 aliphatic fraction it is not appropriate for groundwater or pore water.

The toxicologically defensible approach is for the EPA to compare the concentrations of individual TPH-d fractions, based on freely dissolved hydrocarbons as measured by solid-phase microextraction (SPME) or comparable technique, to the toxicity values of each fraction (similar to the TPHCWG approach). Our recommendation is to define the TPH-d remedial goal in this manner.

Respectfully Submitted,
Chevron Environmental Management Company

Nathan Blomgren, P.G.